

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY ZARA,

Plaintiff,

v.

DEVRY EDUCATION GROUP, INC.;
DEVRY MEDICAL INTERNATIONAL,
INC.; ROSS UNIVERSITY SCHOOL OF
MEDICINE, SCHOOL OF VETERINARY
MEDICINE (ST. KITTS) LIMITED; and
ALEXA FERRARI;

Defendant.

Civil Action No. 1:16-cv-5156

Honorable Judge Andrea R. Wood
Room 1925

NOTICE OF MOTION

To: Brian M. Stolzenbach, Esq.
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PLEASE TAKE NOTICE that on **June 30, 2016, at the hour of 9:00 a.m., ANTHONY ZARA**, by his undersigned counsel, shall appear before the Honorable Andrea R. Wood, or any other District Court Judge who may be sitting in her stead, in courtroom 1925 of the United States District Court for the Northern District of Illinois, 219 Dearborn Street, Chicago, Illinois, and shall then and there present **PLAINTIFF'S EMERGENCY MOTION FOR ONE DAY EXTENSION TO FILE OPPOSITIONS TO MOTIONS TO DISMISS**, a copy of which is attached hereto and hereby served upon you.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 22, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court via the Court's CM/ECF system, which will send electronic notification of such filing to:

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Attorney for Defendant Alexa Ferrari

/s/ Jason J. Bach
Jason J. Bach

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Defendants.

Civil Action No. 1:16-cv-5156

Honorable Judge Andrea R. Wood
Magistrate Judge Sidney Schenkier

**PLAINTIFF’S EMERGENCY MOTION FOR ONE DAY EXTENSION TO FILE
OPPOSITIONS TO MOTIONS TO DISMISS**

NOW COMES Plaintiff, ANTHONY ZARA (“Zara” or “Plaintiff”), by and through his undersigned attorneys, and hereby moves this Honorable Court on an emergency basis for an extension of one day to file his oppositions to motions to dismiss due to an electrical outage, which is preventing completion of the drafting and mandatory electronic filing of said oppositions. In support of his Motion, Plaintiff states as follows:

1. Pursuant to this Court’s Order dated May 25, 2016, all Defendants filed their motions to dismiss in the above-captioned cause on June 8, 2016.
2. Also pursuant to this Court’s Order dated May 25, 2016, Plaintiff is to file his responses to said motions on June 22, 2016.
3. Plaintiff’s counsel is primarily drafting said responses in Northwest Indiana but is experiencing a sustained power outage due to severe thunderstorms and is unable to complete and file said oppositions today.

4. Assuming that power is restored, Plaintiff's counsel needs no more than 24 hours to complete the responses and electronically file them with the Court.

5. Accordingly, Plaintiff moves this Court for an additional 24 hours to file his responses to Defendants' motions. Plaintiff's counsel has been unable to confer with counsel for Defendants due to the time of day. In addition, while Plaintiff's counsel is able to file this brief motion via their Nevada office, they are unable to do that with the oppositions.

WHEREFORE, Plaintiff ANTHONY ZARA respectfully requests that the deadline for his oppositions to all of Defendants' motions pending before the Court be extended until June 23, 2016, due to electrical failure. Plaintiff has no opposition to Defendants' reply deadline being extended by one day.

Respectfully submitted,

THE BACH LAW FIRM, LLC

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